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Peter Wolfgram, Esq.
Xiyan Zhang, Esq.
Stratum Law LLC
Attorney for Plaintiff Ameriway Corporation
150 Monument Rd., Suite 207
Bala Cynwyd, PA 19004

Re: Ameriway v Chen 19 -cv-09407 (VSB)
Deficient Discovery – Request for Supplemental Production

Gentleman:

With respect to defendant's 1st demand for the production of documents dated October 12, 2020, the following response was incomplete, and we hereby request that you address the deficiencies.

- 13.** All documents related to payments made by Ameriway Corp to or on behalf of Eagle Trading USA LLC for the period of February 1, 2017 and October 31, 2019 including but not limited to:
- a. all invoice from Eagle to Ameriway for reimbursement of expenses associated with the importation of goods by Eagle;
 - b. each check or other instrument or record of payment for reimbursement of any expenses associated with the importation of goods by Eagle;
 - c. Each invoice from Eagle to Ameriway for services or other expenses relating to the goods

- contained in the containers identified in Exhibit “A” or in containers identified as OOCU6964350, BMOU5390536, BMOU4739454, HLXU8057236, APHU7253481, OOLU9537235;
- d. Copy of each check or other instruments of payment, whether issued by Plaintiff or received by Plaintiff with respect to goods/cargo in the containers identified as OOCU6964350, BMOU5390536, BMOU4739454, HLXU8057236, APHU7253481, OOLU9537235;
- e. Copy of any Ability invoice paid by Eagle for which Ameriway reimbursed Eagle with the cargo/goods contained in the containers identified in exhibit “A” or in containers identified as OOCU6964350, BMOU5390536, BMOU4739454, HLXU8057236, APHU7253481, OOLU9537235;
- f. Copy of any Ability invoice paid by either Eagle or Ameriway with respect to the containers identified as OOCU6964350, BMOU5390536, BMOU4739454, HLXU8057236, APHU7253481, OOLU9537235;
- g. Copy of each check or other instruments or record of payment with respect to any expense related to the goods, cargo or any other expense related to containers identified as OCU6964350, BMOU5390536, BMOU4739454, HLXU8057236, APHU7253481, OOLU9537235;
- h. All documents related to operating expenses paid by Ameriway Corp on behalf of

Eagle Trading USA LLC for the period of February 1, 2017 and October

31, 2019 including but not limited to Rent, Phone, Internet, Payroll,

Payroll taxes and/or other operating expenses;

Plaintiff has provided at Bates AMERIWAY 0077618 through AMERIWAY 0077643 accounting records for the period January 1, 2019 through November 22, 2019, but has not produced any comparable records pertaining to the balance of the requested period of February 1, 2017 to October 31, 2019.

If the plaintiff believes that these documents have already been provided, please identify them by your Bates numbers.

If you do not have these documents within your possession, state so, and identity who might be in possession of such documents.

If you have them, please provide them.

With respect to defendant's 2nd demand for the production of documents dated January 26, 2021, the following response missing, and we hereby request that you address the deficiencies.

40. Any minutes or operating agreements or similar documentation which purport to authorize Xiyan Zhang to represent Eagle Trading USA, LLC in any capacity including as its "COO".

If the plaintiff believes that these documents have already been provided, please identify them by your Bates numbers.

If you do not have these documents within your possession, state so, and identity who might be in possession of such documents.

If you have them, please provide them.

Sincerely,

SHAYNE LAW GROUP, P.C.

William Shayne (electronic signature)

William Shayne